

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff and Counterclaim-Defendant,*

v.

Cellco Partnership d/b/a Verizon Wireless *et al*,

*Defendants and Counterclaimant-Plaintiffs.*

Case No. 2:25-cv-00391-JRG-RSP

(Lead Case)

HEADWATER RESEARCH LLC,

*Plaintiff and Counterclaim-Defendant,*

v.

SPRINT LLC *et al*,

*Defendants and Counterclaimant-Plaintiffs.*

Case No. 2:25-cv-00359-JRG-RSP

(Member Case)

HEADWATER RESEARCH LLC,

*Plaintiff and Counterclaim-Defendant,*

v.

AT&T SERVICES, INC. *et al*

*Defendants and Counterclaimant-Plaintiffs.*

Case No. 2:25-cv-00428-JRG-RSP

(Member Case)

**JOINT MOTION TO EXTEND CONTENTIONS DEADLINES**

Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Cellco Partnership d/b/a Verizon Wireless *et al*., T-Mobile USA, Inc. *et al*., and AT&T Services, Inc. *et al*., (collectively, “Defendants”), (collectively, the “Parties”) file this Joint Motion to Extend Deadline for Infringement and Invalidity Contentions and would show the Court as follows:

The current deadline for Headwater to serve infringement contentions in compliance with P.R. 3-1 and PR 3-2 was July 23, 2025. The current deadline for Defendants to serve invalidity contentions in compliance with P.R. 3-3 and P.R. 3-4, and to serve subject-matter eligibility contentions, is October 1, 2025. The parties jointly move for a brief mutual extension of these deadlines, which will allow additional time for the parties to prepare their contentions disclosures. No other deadlines will be affected by these amendments.

The parties represent that this Motion is not filed for the purposes of delay but rather so that justice may be served. Accordingly, the parties respectfully requests that the Court enter an Order modifying the above deadlines as follows:

Original Date	Amended Date	Event
July 23, 2025	<b>July 25, 2025</b>	Comply with P.R. 3-1 & 3-2 (Infringement Contentions)
October 1, 2025	<b>October 10, 2025</b>	Comply with Standing Order Regarding Subject-Matter Eligibility Contentions
October 1, 2025	<b>October 10, 2025</b>	Comply with P.R. 3-3 & 3-4 (Invalidity Contentions)

Dated: July 24, 2025

Respectfully submitted,

/s/ Marc Fenster  
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*Attorneys for Plaintiff,  
Headwater Research LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served on July 24, 2025, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster

Marc Fenster

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). Defendants do not oppose this motion.

/s/ Marc Fenster

Marc Fenster